

REMARKS

Claims 1-56 are now pending in this application. Claims 1, 3, 5, 8, 9, 10, 16, 18, 20, 32, 34, and 36 are independent.

Claims 1-3, 5, 8-10, 16-20, 26, 28-41, 43, 47-49, and 51-52 have been amended, no claims are canceled, and claims 54-56 are added.

Claims 1-3, 5, 8-10, 16-20, 32, 34, 36, 38-41, 43, 47-49, and 51-52 are amended to recite a portable camera. Additional amendments to claims 26, 28, 29-37 are not responsive to any Examiner-noted deficiencies, and are merely presented to overcome minor informalities and antecedent issues.

Claim Rejections Under 35 U.S.C. § 112

The Office Action rejected claims 1 and 20 under 35 U.S.C. § 112, first paragraph, as failing to comply with the written description requirement. The Office Action alleges that because the term "adapting device" does not appear in the specification or original claims, it is new matter. However, no statute or rule requires that a claim element must be supported verbatim. Rather, "[t]he subject matter of the claim need not be described literally (i.e., using the same terms or *in haec verba*) in order for the disclosure to satisfy the description requirement." MPEP § 2163.02.

In this case, the specification clearly describes the adapting device of claims 1 and 20, using other terminology. The paragraph beginning on page 8, line 25, for example, recites that "contents of the operating screen may be changed [i.e., adapted] based on the utility data [which is] is recorded ... in association with the identification information of the electronic camera 10

itself ... and the latest operating screen may be informed to the user by selecting or customizing [i.e., adapting] the data which is selected to be useful for an individual user."

Accordingly, Applicant respectfully requests withdrawal of the § 112 rejections.

Claim Objections Under U.S.C. § 103(a)

Claims 1-15, 20-32, 38-41 and 43-53

The Examiner rejects claims 1-15, 20-32, 38-41 and 43-53 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,715,003 to Safai (hereinafter "Safai") in view of U.S. Patent No. 6,646,677 to Noro et al. (hereinafter "Noro"). This rejection is traversed.

Among other requirements for a *prima facie* case of obviousness, a prior art reference (or references when combined) must teach or suggest all the claim limitations. MPEP §2142. Safai and Noro, alone or in combination, do not satisfy this obligation.

To put it simply, neither Safai nor Noro discloses at least use of "product identification information identifying a particular portable camera registered by a user", as variously recited by independent claims 1, 3, 5, 8, 9, 10, 20, and 32. The Office Action concedes that "Safai does not specifically disclose identification information for a camera device for a user." (OA, page 4). However, contrary to an Office Action allegation, Noro also fails to disclose the above-noted features. In addition to the remarks presented below, Applicant reiterates remarks made in the previous response demonstrating the deficiency of Noro which were not addressed in the Office Action dated October 9, 2007.

Identification information disclosed by Noro does not identify "a particular portable camera registered by a user", as required by independent claim 1, 3, 5, 8, 9, 10, 20, or 32. Instead, Noro discloses "identification information for uniquely identifying the camera

management device 12 or 14." (Noro, col. 8, lines 47-51. Emphasis added). This management device is not a portable camera, but a device configured for controlling a direction and zoom ratio of immobile surveillance cameras connected to the management device. (Id., col. 6, lines 56-64). Furthermore, the identification information disclosed identifies not the management device product, but its address. In one embodiment, the identification information is merely an IP address of each management device. (Id., Fig. 8; col. 8, lines 51-55). An IP address is not known to identify a product connected to an associated network connection. Moreover, as Noro discloses that multiple cameras may be connected to a single camera management device, it is clear that the identification information for the management device is not intended to identify particular cameras. (See Id., col. 13, lines 15-17). Moreover, the video cameras disclosed by Noro are monitoring cameras fixed in a specific location, and thus not portable, in contrast to the portable camera recited by the present claims.

Because product identification information of a portable camera is not disclosed in the Noro surveillance system, and thus cannot be utilized for identifying a particular portable camera, Noro does not remedy the deficiencies of Safai. Accordingly, Applicant respectfully submits that independent claims 1, 3, 5, 8, 9, 10, 20, and 32 are in condition for allowance.

Additional distinctions for Claims 1 and 20:

Neither Safai nor Noro discloses "an adapting device that adapts a service menu associated with the products identification information" or "adapting a service menu associated with the product identification information," as recited in claims 1 and 20, respectively, and supported in the specification as described above. Hence, independent claims 1 and 20 are believed to be in condition for allowance additionally based on this difference.

Still further, the Office Action concedes that Safai does not disclose "a second communication device that transmits the product identification information ... to the service center," as recited in independent claim 1 and analogously in independent claim 20. Noro does not remedy this deficiency. Since the Noro camera management device does not receive, store, or transmit any identification information of a connected video camera, much less product identification information, the camera management device cannot be the alleged second communication device that transmits identification information. Independent claims 1 and 20 are therefore believe to be further allowable over the cited references.

No rationale to combine Safai and Noro:

The Office Action alleges that it would have been obvious to "modify [Safai] to enable the transmission of identification information for a user camera device as taught by Noro." Such combination, the Office Action alleges, would be obvious "in order to optimize real-time camera control for a client having access control [i.e., a camera operation device, or personal computer]." (OA page 5). Although real-time production of images at, and remote direction and zoom control by a camera operation device (e.g., a personal computer) may be desirable for a video surveillance system, such as that disclosed by Noro, such real-time features would serve little purpose in, and may serve to destroy, the apparatus and methods of the present invention. Therefore, Applicant respectfully submits that no legitimate reason for combining Safai with Noro has been demonstrated.

As Noro does not disclose "product identification information of a portable camera", nor any use of such information, a person having ordinary skill in the art at the time of invention could not find obvious a modification of Safai in view of Noro for the purpose of addressing this

feature. Therefore, independent claims 1, 3, 5, 8, 9, 10, 20, and 32 are believed to be in condition for allowance. Claims 2, 4, 6-8, 11-15, 21-31, 38-41, and 43-53 depend either directly or indirectly from independent claim 1, 3, 5, 8, 9, 10, 20, or 32, and are believed to be allowable for the reasons given for said independent claims, in addition to claiming other features.

Accordingly, Applicant submits that the rejection of claims 1-15, 20-32, 38-41 and 43-53 is traversed. Reconsideration in view of the above arguments is respectfully requested.

Claims 16-19, 33-37 and 42

The Office Action rejected claims 16-19, 33-37 and 42 under 35 U.S.C. § 103(a) as being unpatentable over Safai and Noro in view of U.S. Patent No. 5,918,211 to (hereinafter "Sloane"). However, independent claims 16, 18, 34, and 36 include features that require "product identification information identifying a particular portable camera registered by a user". As demonstrated above regarding the other independent claims, Safai and Noro do not together or in combination disclose such product identification information. Sloane does not remedy the deficiency. Independent claims 16, 18, 34, and 36 are therefore believed to be in condition for allowance for the same reasons given above, in addition to claiming further features. Claims 17, 19, 35 and 37 depend from claims 16, 18, 34, and 36; and are therefore believed to be in condition for allowance for the same reasons.

Claims 33 and 42 depend, respectively, from base claims 32 and 8. These base claims, as discussed above, are believed to be in condition for allowance. As Sloane does not remedy the deficiencies of Safai and Noro, claims 33 and 42 are believed to be in condition for allowance for the same reasons discussed for the base claims from which they depend.

Applicants respectfully request withdrawal of the rejections for and reconsideration of claims 16-19, 33-37 and 42.

CONCLUSION

In view of the above remarks, it is believed that claims 1-56 are allowable.

Should there be any outstanding matters that need to be resolved in the present application, the Examiner is respectfully requested to contact James C. Larsen, Reg. No. 58,565 at the telephone number of the undersigned below, to conduct an interview in an effort to expedite prosecution in connection with the present application.

If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies to charge payment or credit any overpayment to Deposit Account No. 02-2448 for any additional fees required under 37.C.F.R. §§1.16 or 1.17; particularly, extension of time fees.

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Respectfully submitted,

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